

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
v.) No. 4:14CR00175 AGF (DDN)
)
)
)
MARK PALMER, et al.,)
)
)
Defendants.)

**GOVERNMENT'S SUPPLEMENTAL DISCLOSURE OF ARGUABLY SUPPRESSIBLE
EVIDENCE PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

COMES NOW the United States of America by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and James C. Delworth, Assistant United States Attorneys for said District, and makes the following supplemental disclosure pursuant to Federal Rule of Criminal Procedure 12(b)(4) and Federal Rule of Evidence 404(b).

This filing supplements the disclosure of arguably suppressible evidence filed on July 16, 2014. In addition to the events set forth in the original disclosure,¹ at trial, the Government intends to use the evidence seized and statements made by the defendants during the events described in the attached chart(s). (See Attachments #1 and #2.) This evidence and these statements are more fully set forth in the investigative reports which have been made available to defendants. The defendant or defendants indicated that have standing represents the

¹ The Court's order directs the Government to set forth the party or parties who the Government believes have standing to file a motion to suppress. The Government has inserted its position with respect to standing as to the events identified in the original disclosure. The amended chart is attached as Attachment #1.

government's position with respect to standing as to each event and is not intended to preclude any defendant from filing a motion to suppress.

The Government does not have any evidence that will be offered at trial pursuant to Federal Rule of Evidence 404(b).

Upon reciprocal agreement by the defense, the Government, pursuant to Federal Rule of Criminal Procedure 16, will disclose its expert witnesses and a summary of their testimony prior to trial. The Government will disclose all Jencks Act material and/or impeaching information no later than the Friday before trial.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ James C. Delworth
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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Attorneys of record for all defendants.

s/ James C. Delworth
JAMES C. DELWORTH, #29702MO
Assistant United States Attorney